The Honorable Ricardo S. Martinez 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 SECURITIES AND EXCHANGE No. 2:24-cv-01542-RSM COMMISSION, 10 STIPULATED MOTION AND Plaintiff, [PROPOSED] ORDER FOR EXTENSION 11 OF DEADLINE TO RESPOND TO **COMPLAINT** 12 WILLIAM D. CARLTON, NOTE ON MOTION CALENDAR: 13 November 14, 2024 Defendant. 14 15 Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiff Securities and Exchange 16 Commission ("Plaintiff") and Defendant William D. Carlton ("Defendant"), by and through their 17 respective counsel, hereby stipulate as follows: 18 1. Plaintiff filed its Complaint on September 27, 2024 (Dkt. 1); 19 2. Plaintiff requested a waiver of service of the summons on September 27, 2024. 20 Prior counsel for Defendant provided the signed waiver of service to the Commission on 21 October 23, 2024, and the Commission filed it on October 24, 2024 (Dkt. 6). 22 3. Pursuant to FRCP 12, Defendant's current deadline for answering or otherwise 23 responding to the Complaint is November 26, 2024. 24 25 STIPULATED MOTION AND [PROPOSED] ORDER CORR CRONIN LLP FOR EXTENSION TO RESPOND 1015 Second Avenue, Floor 10 TO COMPLAINT - 1 Seattle, Washington 98104-1001

(No. 2:24-cv-01542-RSM)

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4. Counsel for Plaintiff and Defendant have conferred and stipulate to an extension of time for Defendant to answer or otherwise respond to the Complaint from November 26, 2024 to January 3, 2025.

In making this stipulation, the Defendant does not waive, in this or any other action, any defenses or arguments, including but not limited to (i) defenses or arguments for dismissal that may be available under Fed. R. Civ. P. 12; (ii) affirmative defenses under Fed. R. Civ. P. 8; or (iii) other statutory or common law defenses that may be available. Defendant expressly reserves the right to raise any such defenses (or any other defense) in response to either the Complaint or any amended complaint that may be filed in this action.

In consideration of the facts set forth above, the parties hereby stipulate and agree to extend the deadline for Defendant to answer or otherwise respond to the Complaint to January 3, 2025.

DATED this 14th day of November, 2024.

I certify that this memorandum contains 261 words, in compliance with the Local Civil Rules.

## CORR CRONIN LLP

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U.S. SECURITIES AND EXCHANGE 1 COMMISSION 2 <u>s/ David D'Addio</u> David D'Addio 3 Susan R. Cooke 4 Boston Regional Office 33 Arch Street, 24th Floor Boston, MA 02110 5 Ph: (617) 573-4526 (D'Addio direct) 6 daddiod@sec.gov 7 cookes@sec.gov Attorneys for Plaintiff 8 9 10 IT IS SO ORDERED. 11 Dated this day of November, 2024. 12 13 14 The Honorable Ricardo S. Martinez United States District Judge 15 16 17 18 19 20 21 22 23 24 25

STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION TO RESPOND TO COMPLAINT - 3 (No. 2:24-cv-01542-RSM)

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